

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LESLIE A. FARBER, LLC

33 Plymouth Street, Suite 204

Montclair, NJ 07042

Ph. (973) 509-8500

email: LFarber@LFarberLaw.com

Attorneys for Defendants/Counterclaimants

MALIBU MEDIA, LLC,

Plaintiff,

vs.

**TIM McMANUS and GREENWOOD
DIGITAL, LLC,**

Defendants.

Hon. William J. Martini, U.S.D.J.

Case No. 2:17-cv-01321-WJM-MF

CIVIL ACTION

**CERTIFICATION OF
TIM McMANUS**

1. I, Tim McManus, am a defendant in the above captioned matter and have personal knowledge of the facts contained herein.

2. One of my students at Fordham University alerted me that a Google search of the terms “Tim McManus Greenwood Digital” returns a link to Malibu Media’s false accusations against me. It is a challenge explaining to the students that I did not download the titles outlined in the plaintiff’s Complaint. These accusations have harmed my reputation since I cannot say (yet) that I won a favorable judgement in the case.

3. The company that I own, Greenwood Digital, LLC (the other defendant in the case), works with enterprise and government data. Any question regarding Greenwood Digital’s handling of data has significant and lasting impact on the company’s and my personal reputation. The plaintiff’s accusations and this case bring into question Greenwood Digital’s handling of plaintiff’s copyrighted materials, which are data.

4. Greenwood Digital and I are fighting this case on its merits in order to seek a favorable judgement from the court. That judgement would validate that Greenwood Digital and I did not infringe on plaintiff's copyrighted material (data), and that Malibu Media erred in bringing litigation against both.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 21, 2019

A handwritten signature in black ink, appearing to read 'Tim McManus', written over a horizontal line.

Tim McManus